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Wyo. State Bar # 4-1063
Attorney for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

MARTIN CHAPARRO, and)	
JAMES GOULD and ERIN GOULD,)	
and ERIN GOULD as natural guardian)	Civil Action No. 08 CV - 049B
for FRANK GOULD and)	
JASMINE GOULD,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
COLORADO CASUALTY INSURANCE)	
COMPANY,)	
)	
Defendant.)	

***PLAINTIFFS' DESIGNATION OF SCOTT RIGGINS, M.D., BILLINGS DEACONESS
CLINIC AS A TREATING PHYSICIAN***

Scott Riggins, M.D. will testify as to the examination, treatment and testing of Plaintiff James Gould for injuries that Mr. James Gould suffered in the collision of February 17, 2004. Dr. Riggins will testify as to his knowledge, background and experience as a board certified neurologist concentrating in sleep disorders and board certified in

electrodiagnostic medicine. He will testify to the fact that Mr. Gould was referred to him by Dr. Cahill for examination and treatment of Mr. Gould's problems with sleeping.

Plaintiffs' Exhibit 186 hereto is Dr. Riggins' curriculum vitae which includes his list of publication. Plaintiffs' Exhibit 187 is Dr. Riggins' legal appearances and Plaintiffs' Exhibit 188 is Dr. Riggins' statement of charges.

Dr. Riggins' opinions are based upon Mr. Gould's medical records and his own examination, testing and treatment of Mr. Gould. The billing for the examination, evaluation and treatment plan were billed through and paid for by Wyoming Worker's Safety Compensation Division.

Dr. Riggins will testify to the following opinions to a reasonable degree of medical probability in accordance with Wyoming law:

1. That Mr. Gould suffers a condition of sleep apnea which requires a device called a C-PAP which forces air into the lungs of Mr. Gould during sleep when his breathing stops.
2. That the type of sleep apnea suffered by Mr. Gould is both a symptom and symptomatic of Mr. Gould's the post concussive problems.
3. That the sleep apnea condition is the result of the automobile collision of February 17, 2004.
4. That Mr. Gould's sleep apnea is chronic and will likely require the use of the C-PAP machine for the balance of his life.

These opinions and diagnoses by Dr. Riggins derives from his experience and training coupled with review of pertinent records, conferences with his colleagues Drs. Thai and Cahill, and the testing, examination and direct observation of Mr. Gould as set out in Dr. Riggins notes and records which have previously been provided to Defendant.

Dr. Riggins may be asked to testify in response to any expert witnesses on the subject of Mr. Gould's sleep problems, conditions and diagnosis and the relationship of concussive injuries in the February 17, 2004 collision. He may further be asked to demonstrate the use and application of the C-PAP machine that will be utilized by Mr. Gould.

Dated: this 16th day of July, 2008.

/s/Stephen L. Simonton

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CERTIFICATE OF SERVICE

I, Stephen L. Simonton, hereby certify that on this 16th day of July, 2008, I served a true and correct copy of the foregoing Designation by filing it with the Clerk of Court using the CM/ECF system which will send notification to counsel for the Defendant at the following e-mail address and also mailed by U.S. Mail:

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